

**Federal Communications Commission**



**Communications Equity and Diversity Council  
Diversity and Equity Working Group  
Workstream 4**

**Enhancing Media Ownership and  
Entrepreneurial Opportunities for Minorities and Women**

**Adopted: June 15, 2023**

**Diversity and Equity Workstream 4 Members**

Christopher Wood, LGBT Tech, Working Group Chair  
Ellen Schned, Strong Women Alliance, *Workstream 4 Co-Lead*  
Graham “Skip” Dillard, Audacy New York 94.7 WXBK-FM, *Workstream 4 Co-Lead*  
Melody Spann Cooper, Midway Broadcasting Corporation, *Workstream 4 Co-Lead*  
Faith Bautista, National Diversity Coalition  
Otto Padron, Meruelo Media  
Charlyn Stanberry, National Association of Broadcasters  
James Winston, National Association of Black Owned Broadcasters



over media and communications, the FCC can be a resource of fact-based information for Congress, the White House, and other branches of government that may help in assessing retransmission consent rules, and other congressional policies subjected to FCC jurisdiction.

**Recommendation Three:** The FCC or the next charter of the CEDC could create a comprehensive resource guide to inform the next generation of minority leaders and broadcast owners on training programs, government and private funding opportunities on upskilling and professional development.

**Recommendation Four:** The FCC should work with Congress to help minorities and women gain greater access to capital through existing and emerging funding opportunities and ad dollars (especially those allocated to federal agencies) to support diverse owners in acquisitions, operations, carriage, and marketing.

## 2. Overview of the February Symposium and Expert Interview

Over the course of the two-year CEDC charter, D&E Workstream 4 has focused on ways to advance greater representation and inclusion in media, cable and tech ownership, employment, and supplier diversity. In particular, D&E Workstream 4 explored and responded to certain regulations or policies that appear to impede minority advancement (by their presence or absence), considering greater inter- and intra-governmental coordination on policies that touch multiple agencies, examining synergies that exist between and among public and private sectors; and identifying what improved information flows would serve as valuable resources to advance greater representation in the media, communications, and technology sectors.

These discussions led the workstream group to focus on the following four areas:

- Increasing minority broadcast ownership through the issuance of a revised and updated MTC program
- Review of retransmission consent rules
- Grooming next generation diverse leaders and owners
- Access to capital for acquisition, advertising, and supplier diversity

These areas formed the agenda for the workstream's February 7, 2023, symposium at the Commission's Washington D.C. headquarters. FCC Commissioner Geoffrey Starks delivered opening remarks and offered highlights from the most recent FCC Broadcast Ownership Report. The sixth biennial report on ownership of broadcast stations covers commercial and noncommercial, full-power and low-power TV and radio stations and is based on data as of October 2021. The report is designed to obtain data by gender, race, and ethnicity to help inform the public, Congress, and the Commission in gaining insight into the ownership of broadcast stations. This trend data could be relevant to the Commission's policy making. Key ownership report findings were that:

- Of over 1700 full-power TV stations, only 5% are owned by women. 4% Latino, 3% Black, 1% Asian.

- Of over 15,000 commercial radio stations 9% women owned, 5% Latino, 2% Black, 1% Asian.<sup>3</sup>

After years of efforts to encourage a more meaningful uptick in minority representation and ownership in media and telecommunications, these and other findings were underwhelming and not surprising. They were also confirmed in the symposium which focused on the tax certificate program, opportunities and obstacles for broadcasters, small cable operators and independent programmers and strategies for compiling resources for the next generation of diverse owners. In his remarks, Commissioner Starks also suggested that the broadcast industry was no longer focused on just linear media, and that cable and streaming were opening doors for more minority participation in media ownership. Commissioner Starks also noted that Asian ownership in TV and radio is a distant third (at less than 1%.) when compared to other minority populations. The February symposium had three outstanding Asian women business owners on its panels who echoed the same findings and said “enough is enough.” Faith Bautista, President and CEO of the National Diversity Coalition (NDC) and ChimeTV, Diana WP Ding, 20-year veteran TV station owner in Silicon Valley (Ding Ding TV) and CEDC Vice Chair and CEO of the US Pan Asian American Chamber of Commerce Education Foundation (USPAACC) Susan Au Allen, all expressed exasperation at the uphill climb of being a distant third – despite their excellent offerings, hard work, passion, and significant economic reach. With Asians accounting for 7.3% of the entire U.S. population, the AANHPI (Asian American, Native Hawaiian, and Pacific Islander) community is highly under-represented and devalued in the media, which should also be addressed.

The symposium showcased several diverse broadcasters, and creatives, including CEDC member Faith Bautista, who recently launched the first ever woman- and Asian-owned AANHPI network, ChimeTV. Another event panelist was Ryan Johnson, Founder and CEO, Cxmmunity Media, a gaming enterprise that partners with Historically Black Colleges and Universities (HBCUs) to provide minority students with training and skills to get jobs in the gaming/tech industries. A third panelist who appeared in person was industry expert and 20-year veteran Asian American woman TV station owner, producer and journalist, Diana WP Ding. Ms. Ding’s TV station conducts in-language real time interview broadcast reports such as the mass shooting in a Monterey Park dance studio in California in January 2023.

Industry experts were also invited to provide additional insights into research on diverse media, including Maria Brennan, CEO of the WICT Network, who tracks how women are faring in the media and telecom industries. Findings from the recent WICT PAR initiative showed that women are making meaningful strides in upper and middle management, but statistics on women owners, CEO ranks and Boards still need improvement.<sup>4</sup> Adriana Waterston of Horowitz Research, confirmed Starks’ remarks showing significant shifts in viewing habits away from linear to streaming services and increased demand for multicultural content.

Other panelists included Diane Sutter, who has successfully trained thousands of women and minorities looking to advance in broadcasting through the National Association of Broadcaster’s Broadcast Leadership Training (BLT) program, and Albert Rodriguez, who is the CEO of Spanish Broadcasting System Broadcasting, which is one of the largest minority owned Hispanic radio group in the U.S.<sup>5</sup> Both of their remarks highlighted the critical significance of

<sup>3</sup> See n. 2, *supra*.

<sup>4</sup> WICT PAR <https://wict.org/par-initiative>.

<sup>5</sup> SBS Chairman Raúl Alarcón is a member of the CEDC, creating content and greater reach through deliberate efforts that advance diversity in communications.

Panelists generally agreed that maintaining relationships is critical to being in the “deal flow” or getting the call when acquisition opportunities arise. Panelist Alfred Liggins, CEO, Urban One, Inc., shared that he was a beneficiary of those “calls” which was the springboard for his family’s radio empire today.

Other comments called out historic and long-standing challenges to achieving diversity, equity, and inclusion in industry sectors, including those related to the inability to scale, access capital or how to leverage the relationships when deals become available. For instance, while ChimeTV received initial support from Charter to launch in all 41 of their markets, reaching 10 million subscribers, no other distributor has yet to step up to launch the nascent network, making it more difficult for them to secure ad revenues or investments needed for programming and sustainability.<sup>6</sup> Furthermore, as Bautista indicated, it has become virtually impossible for minority networks to get even a small license fee, which has historically been a critical revenue stream for network operations. On this point, CEDC member and panelist, Otto Padron, President and CEO of Meruelo Media (Hispanic owned TV and radio station group) indicated that “[w]e (broadcasters) are not looking for hand-outs, just more of a level playing field and greater parity.”

The conversation around the importance of supplier diversity came up throughout the symposium as another area that requires additional consideration because, despite best intentions, more needs to be done to support minority companies. Meruelo Media lost out on a supplier diversity grant in California to one of the largest radio groups in the U.S., iHeart Media, which is not minority owned, due to the iHeart’s ability to offer scale in their application, “to reach the rural & underserved markets.” Despite Meruelo Media reaching many of those same markets in Southern California, however, it is often a more “efficient buy” to go with a larger company with national reach, according to Padron.

In a separate interview with D&E Workstream 4, CEDC member James Winston, (NABOB), he shared the importance of supplier diversity as it is applied to broadcast advertising, particularly when referencing the ad purchasing power of the federal government that spends hundreds of millions in advertising, including promotions for military recruitment among other segments. Winston suggested that the government has bypassed Black-owned radio and TV stations in favor of the larger media groups because they can provide volume discounts based on their massive reach.<sup>7</sup>

---

<sup>6</sup> CEDC Media Ownership Diversity Symposium, *FCC*  
<https://www.fcc.gov/news-events/events/2023/02/media-ownership-diversity-symposium>.

<sup>7</sup> California has draft legislation (AB 1511) intended to implement safeguards to ensure supplier diversity grants and credits are justly reviewed and applied to minority-owned companies, which should set a precedent for discussions regarding possible revisions or safeguards on policies, like supplier diversity that are important and well-intended, but over time, stray from their intent.

Evaluating supplier diversity, reviews of current policies, such as California legislation AB1511, and hearing from groups like the Latino Media Collaborative (LMC) which advocates for multi-cultural fairness, would aid in this effort.

The symposium and subsequent D&E Workstream 4 weekly meetings also evidenced that several legislative and regulatory discussions on how to drive more diverse media were overdue including on the following issues: (a) the minority tax certificate program with some safeguards and updates; and (b) retransmission consent in a changing media ecosystem. D&E Workstream 4 also focused on the grooming of new talent and what was still needed to improve access to capital for existing and aspiring diverse broadcast owners. The next section provides some background on each of these areas.

- The Minority Tax Certificate (MTC) Program

Commercial radio has existed since the early 1920's. It would not be until the mid-1940's that increased minority representation changed the trajectories of radio, beginning in the largest metropolitan areas containing diverse populations.<sup>8</sup> With the broad acceptance of television in the mid 1940's, it would take almost a decade before the first Hispanic-owned TV station signed on.<sup>9</sup> And it was not until the 1970's before the first Black-owned TV station was licensed.<sup>10</sup> As the FCC broadened the spectrum of both radio and TV license availability, little to no consideration was offered to minority populations. By the mid 1970's, minorities represented less than one percent of broadcast ownership despite people of color representing 20% of the population.<sup>11</sup> In response, the FCC convened a task force to consider measures that would increase minority participation, which resulted in the MTC that was enacted in 1978 and gave majority owners a tax incentive to sell broadcast properties to minorities (a 1031 Exchange).<sup>12</sup> Despite measurable success, a particularly large deal stirred concerns and in 1995, Congress stepped in to dismantle the Minority Tax Certificate.<sup>13</sup>

From the inception of the MTC in 1978 up until its dismantling in 1995 by Congress, the policy resulted in over 200 transactions, increasing diverse ownership in broadcast stations by over

---

<sup>8</sup> Archives of African American Music and Culture, "Golden Age of Black Radio – Part 1: The Early Years," *Google Arts & Culture* <https://artsandculture.google.com/story/3wUxRMZB2RIOIQ?hl=en>.

<sup>9</sup> Kenton Wilkinson, *Spanish-Language Television in the United States* (New York: Routledge, 2018) p. 38.

<sup>10</sup> Lauren Talley, "First Black-owned TV station in the U.S., founded in Detroit, gave African-American journalists 'opportunity to tell their own story'," *Michigan Radio* (25 February 2022) <https://www.michiganradio.org/arts-life/2022-02-25/first-black-owned-tv-station-in-the-u-s-founded-in-detroit-gave-african-american-journalists-opportunity-to-tell-their-own-story>.

<sup>11</sup> Bari S. Robinson, "Achieving Diversity in Media Ownership: Bakke and the FCC," *California Law Review* Vol. 67 No. 1 (January 1979) pp. 231-255 <https://www.istor.org/stable/3480095#>; See: White, not of Hispanic Origin, PERCENT 1970 & PERCENT 1980 in Campbell Gibson and Kay Jung, "Historical Census Statistics on Populations Totals by Race, 1790 to 1990, and by Hispanic Origin, 1970 to 1990, for the United States, Regions, Divisions, and States," *U.S. Census Bureau Population Division Working Paper No. 56* (September 2002) <https://www.census.gov/content/dam/Census/library/working-papers/2002/demo/POP-twps0056.pdf>.

<sup>12</sup> David Honig, "Tax Certificate Policy," *FCC Advisory Committee on Diversity and Digital Empowerment (ACDDE) Symposium* (6 November 2020) <https://www.fcc.gov/sites/default/files/acdde-symposium-tax-certificate-policy-11062020.pdf>.

<sup>13</sup> Erwin G. Krasnow and Lisa M. Fowlkes, "The FCC's Minority Tax Certificate Program: A Proposal for Life After Death," *Federal Communications Law Journal* Vol. 51 (25 May 1999) pp. 665-679 <http://www.fclj.org/wp-content/uploads/2013/01/kramac9.pdf>.

550% after implementation.<sup>14</sup> The MTC nearly tripled the number of minority-owned broadcast stations, to nearly three percent, from less than one percent. Native American ownership reached its highest level during this period with the acquisition of six total stations including five radio stations, and one television station. However, the MTC failed to address the lack of female-owned broadcast properties, which resulted in a zero percent increase at the time. Further, the 1996 Telecommunications Act was enacted on the heels of the dismantling of the MTC, which many believed would have offered some protections against the measurable decrease in minority participation in broadcast ownership in the years following the bill's passage.<sup>15</sup>

Since the mid 90's, inflated sale pricing and the participation of larger-conglomerates in high volume acquisitions has raised the threshold for minority owner participation whether as a new, or existing minority operator seeking to expand.<sup>16</sup> Numerous efforts to increase diverse media ownership have been undertaken since the elimination of the Minority Tax Certificate, but to no avail.

In the 118<sup>th</sup> Congress, legislation was introduced to reinstate the tax certificate program. Reps. GK Butterfield (NC-01) and Steven Horsford (NV-04) introduced the *Expanding Broadcast Ownership Opportunities Act*.<sup>17</sup> Sens. Gary Peters (MI) and Robert Menendez (NJ) introduced the *Broadcast Varied Ownership Incentives for Community Expanded Service Act*, also known as the Broadcast VOICES Act.<sup>18</sup> Both pieces of legislation were supported by numerous organizations including, but not limited to, Asian Americans Advancing Justice, Hispanic Federation, League of United Latin American Citizens, Multicultural Media, Telecom and Internet Council, National Association of Black Owned Broadcasters, National Urban League and the U.S. Black Chambers.

Several former FCC Chairs have amplified their support for the tax certificate program over the years, including the late Newton N. Minow (1961-1963), Richard E. Wiley (1974-1977), Reed E. Hundt (1993-1997), William E. Kennard (1997-2001), Michael K. Powell (2001-2005), Michael J. Copps (2009), Julius Genachowski (2009-2013), Mignon Clyburn (2013) and Tom Wheeler (2013-2017).

During the February workshop, experts chimed in on the importance of empirical data. Experts like Diane Sutter underscored the positive impact of the MTC and encouraged its

---

<sup>14</sup> Gordon H. Smith, "Congress Should Reinstate Tax Certificate Program to Foster Media Ownership Diversity," *The Hill* (23 June 2020)

<https://thehill.com/blogs/congress-blog/politics/504086-congress-should-reinstate-tax-certificate-program-to-foster/>

<sup>15</sup> Douglas Gomery, "Ownership Policies, Diversity, and Localism," *Statement to FCC Roundtable on Media Ownership Policies* (29 October 2001) <https://www.fcc.gov/roundtable-media-ownership-policies-102901>.

<sup>16</sup> Helen Johnson, "The unprecedented consolidation of the modern media industry has severe consequences," *The Miscellany News* (29 April 2021)

<https://miscellanynews.org/2021/04/29/opinions/the-unprecedented-consolidation-of-the-modern-media-industry-has-severe-consequences/>

<sup>17</sup> H.R. 4871 – Expanding Broadcast Ownership Opportunities Act of 2021, *Congress.gov*

<https://www.congress.gov/bill/117th-congress/house-bill/4871>.

<sup>18</sup> S.2456 – Broadcast VOICES Act, *Congress.gov*

<https://www.congress.gov/bill/117th-congress/senate-bill/2456?q=%7B%22search%22%3A%5B%22%5C%22Finance%5C%22%22%5D%7D&s=1&r=69>.

reinstatement.<sup>19</sup> James Winston of NABOB also echoed the same sentiments on the success of the MTC and advocated for its reinstatement during his March 24, 2023, interview with D&E Workstream 4.

- **Retransmission Consent**

A heated, yet healthy, debate ensued during the symposium on retransmission consent, between the broadcast and cable panelists. The 1992 Cable Act regulated many areas of the cable industry, from pricing to customer service, plus it included a provision aimed at ensuring broadcasters could transmit their signals to local markets to ensure viewers get access to important local news.<sup>20</sup> That provision gave broadcasters the right to opt for must-carry or retransmission consent of their signals. Broadcasters who opted for retransmission consent started collecting license fees from cable distributors at the onset, which have steadily increased and resulted in more broadcasters demanding additional channels from cable operators. During the symposium, panelist, and long-time TV station owner, DuJuan McCoy, shared that broadcast networks are still the most popular watched programming on TV, including their local news, and “...warrant every bit of the retrans fees stations negotiated.” He also underscored a loophole, that retransmission consent is “unevenly applied” to broadcast owners and cable operators. He also indicated that streaming companies, who are also now a part of the broadcast ecosystem, are not included in the current rules.

Panelist Patricia Boyers, President, CEO and Co-Founder of BOYCOM Vision (Boyers owns a small cable system in Poplar Bluff, Missouri), and Faith Bautista, stated that retransmission consent gives broadcasters a glaring advantage over minority and independent networks. Boyers shared, “[w]hen broadcasters demand double digit rate increases and dozens of extra channel slots at each renewal, it squeezes out minority and independent networks.” “We’re (small minority networks) are told there’s no room left at the Inn. That there is limited capacity,” she added. “We’d add more minority networks if not for retransmission consent” was Boyers’ sentiment.

Bautista explained that because retransmission consent forces cable operators to pay increasingly high license fees to broadcasters (largely stemming from exorbitant sports costs), independent and minority networks are told by cable operators that there is no money left for them for license fees, so they are forced to launch for free. What ends up happening is an uphill battle for minorities to raise money. On this point, Boyers stated “...[i]f she wasn’t forced to add so many broadcast digitnets and pay broadcasters double digit rate increases because of retransmission consent, they’d have room for more minority and independent channels.”

What these and other statements from industry experts suggest is that a fresh look at retransmission consent is warranted by Congress, particularly due to a dramatically different media ecosystem that now involves streaming. As the expert agency, the FCC could conduct a study or release a Notice of Inquiry (NOI) to explore such changes.

---

<sup>19</sup> CEDC Media Ownership Diversity Symposium, *FCC*  
<https://www.fcc.gov/news-events/events/2023/02/media-ownership-diversity-symposium>.

<sup>20</sup> H.R.4850 – Cable Television Consumer Protection and Competition Act of 1992, *Congress.gov*  
<https://www.congress.gov/bill/102nd-congress/house-bill/4850>.

## **Education of New Talent**

Another discussion point at the symposium was focused on grooming a new generation of diverse owners. Diversity and Equity Workstream 4 Co-Lead Skip Dillard led the discussion around this important issue at the symposium. It is well known that an industry pipeline approach to ownership provides a solid pool of prospective owners in broadcast. To meet this objective, diversity is needed in the CEO ranks of broadcast companies – an issue addressed by one of the researchers who spoke on the gender gap in broadcasting on the panel. Data suggests that the industry remains male dominated, even as women in executive roles have increased with the exception of board appointments, where women have suffered attrition since 2019.<sup>21</sup> One of many takeaways of this particular session at the symposium was that the FCC and the CEDC are central hubs to collect information on training and funding opportunities and should work with its CEDC members and others to disseminate on social media. Doing so could increase the number of interested and eligible diverse owners.

## **Access to Capital**

Access to sustainable capital was also addressed by most panelists. On the symposium investor panel, experts expressed concerns that despite the availability of monies, the biggest challenge is information flow, getting the word out to inform small and minority business owners how to apply for and get the grants, loans, and investments they need. Further, more information is needed for how they can identify allies and mentors to help.

For example, Niles Stewart of Lendistry, a Black-owned bank specializing in loans for Black-owned businesses, talked about the company's program to invest in minority ventures. Similar avenues for funding earmarked for Hispanic and women-owned businesses were also discussed to ensure that the people attending were aware of the vast funding opportunities. Stephanie Valencia, Executive Chair of the Board, Latino Media Network (LMK) (Valencia and Jess Morales Rocketto raised \$80 million to launch their Hispanic media startup to acquire 18 Hispanic-formatted radio stations), stated that being a Latina-owned media firm has been important to investors. She added that LMK has a "competitive edge" with its share of the market because they care about reaching the Hispanic community on issues like personal finance, health and wellness, and parenting – information, most important to the greater Latino Community.

CEDC Vice Chair Susan Au Allen emphasized exploring areas in the Coronavirus Aid, Relief, and Economic Security Act (CARES) for funding, including the "Digital Equity Act" (e.g., funds available for outreach to the underserved and unserved communities to inform them of funding opportunities to educate, train and employ skilled workers to meet the need of the digital economy. These are revenue streams for broadcasters - TV, cable, radio, digital, etc. – a source of capital). Diversity and Equity Workstream 4 Co-Lead Ellen Schned advised exploring another CARES Act revenue source, ERCs (Employee Retention Credits) for small businesses (defined as 500 or less employees) who stayed open during the pandemic (2019-2022) and kept W2 employees on payroll. They could be eligible for approximately \$10,000 per-W2 employee, like the Paycheck Protection Program (PPP) loans.

---

<sup>21</sup> Karthik Kashyap, "Decline in Board Appointments of Gender, Ethnic, and Racial Minorities: Study," *Spiceworks*

(24 March 2023)

<https://www.spiceworks.com/hr/diversity-inclusion/articles/decline-in-board-appointments-of-gender-ethnic-and-racial-minorities/>.

Finally, ad revenues were another point that came up at the symposium and during the Winston interview. Rejon Thomas Ferdinand, Vice President at Publicis, a global advertising agency, stated that, in his view, the ad industry is fully committed to supporting minority-owned and minority-oriented companies. Rejon is Publicis' Once & For All Coalition lead. The Coalition's aim is to build a more equitable ad ecosystem. It is a multi-year industry-wide consortium, consisting of marketing leads, minority owned suppliers and agency leaders, that seeks to develop long-term solutions.<sup>22</sup> While the advertising industry is stepping up with minority buys and set aside, opportunities exist for minority- and women-owned businesses in the nearly \$100 billion advertising agency's budgets for minorities.

Broadcast group owner, CEDC member and panel moderator, Caroline Beasley, posed the question of whether advocates should use public relations campaigns to pressure the ad industry by exposing "lackluster minority ad buys of some of the biggest brands to the press." Symposium closing speaker Roland Martin, journalist, and TV producer, echoed similar sentiments to diverse media entrepreneurs to stay vigilant, strong and hold business leaders and government leaders' feet to the fire.

CEDC Workstream 4 Co-Lead and CEO, Midway Broadcasting Corporation, Melody Spann Cooper, wrapped up the symposium commenting that since the 1977 FCC meeting to discuss the lack of minority ownership in broadcast media, ownership diversity has improved, but is far below expectations. Spann Cooper highlighted the following statistics:

Of more than 10,000 radio stations;

9% are held by women;  
2% by Blacks;  
1% by Asians; and  
5% by Latino

Spann Cooper referenced the remarks of Commissioner Starks regarding looking to new media opportunities such as cable, streaming and technology as possibilities to increase ownership diversity. In closing, Spann Cooper noted, "We have one common goal, we all are seeking an opportunity to serve our respective communities, to be a positive influence on society, to scale and to share in the prosperity of what this industry provides."

These areas were largely covered during the symposium as well as by meetings held by the Diversity and Equity Workstream 4 over the two years of the CEDC charter. The insights ultimately shaped the final recommendations below that Workstream 4 maintains can advance diverse media ownership and recommends the Commission take the lead in these efforts.

### **III. Diversity and Equity Workstream 4 Recommendations and Action Items**

---

<sup>22</sup>Publicis Media, "Publicis Media Launches Once & For All Coalition to Build More Equitable Ad Ecosystem" <https://www.publicisgroupe.com/sites/default/files/press-releases/2021-07/Publicis%20Media%20Launches%20Once%20%26%20For%20All%20Coalition.pdf>.

Diversity and Equity Workstream 4 respectfully submits the following four recommendations to advance diversity, equity, and inclusion in the media and communications sectors, particularly in the broadcast sector.

**Recommendation One:** The FCC should encourage Congress to reinstate the Minority Tax Certificate policy with safeguards and updates to increase minority broadcast ownership. The FCC could develop and release a study or Notice of Inquiry (NOI) to begin a fact-based interrogation of the MTC's utility to improve diverse ownership in the media and communications sectors.

Actions:

A. The FCC should study, update, and recommend the MTC policy to motivate big companies to sell to minorities and women when divesting stations or groups. Such measures will allow the United States to keep up with current trends of a growing multicultural demographic who require increasingly representative media and communications sectors that advance diversity, equity, and inclusion.

- The FCC should develop a task force similar to that convened in the 1970s which helped to expand on the idea of the MTC policy.
- The study or Notice of Inquiry (NOI) should solicit public comments that support public interest, competitive and economic impact analyses and further explore the reinstatement of the MTC. The study or NOI would develop a factual record to determine ownership metrics before, during and after the MTC's adoption.
- In the study or NOI, the FCC should also seek comments on safeguards around an updated version of a MTC as part of the inquiry to futureproof its existence.

B. The FCC's findings from the study or NOI can provide an accurate economic analysis of the possible tax and financial impacts of a MTC to be shared with Congress.

C. The FCC could further serve as a resource to other government agencies and key congressional committees, including the House Ways and Means and the House Committee on Energy and Commerce to gain bipartisan support to reinstate the MTC.

D. The FCC could also consider adding a provision for women in a revised MTC, who were not included in the previous iteration of the policy.

**Recommendation Two:** As the expert agency, the FCC should conduct a study or release a Notice of Inquiry (NOI) on the state of retransmission consent to determine if revisions or updates are warranted, and those findings should be shared with Congress. As the expert agency over media and communications, the FCC can be a resource of fact-based information for Congress, the White House, and other branches of government that may help in assessing retransmission consent rules, and other congressional policies subjected to FCC jurisdiction.

Actions:

A. The FCC should initiate a study or NOI to create a factual record, including economic impact, consumer analyses, and diversity implications, that evaluates the impact of retransmission consent since it was adopted in 1992. The record in an NOI proceeding would provide a formal and comprehensive record on the policy.

- The FCC should solicit public comments, including input from all interested parties, economic experts and research firms who may weigh in.
- B. The findings of the study or NOI should be shared with Congress so they are more equipped to deliberate warranted updates or revisions.

**Recommendation Three:** The FCC or the next charter of the CEDC could create a comprehensive resource guide to inform the next generation of minority leaders and broadcast owners on training programs, government, and private funding opportunities on upskilling and professional development.

Actions:

- A. The FCC or the next charter of the CEDC should be tasked with the creation of an official resource guide that lists out available organizations, websites, grant opportunities, and other useful information to assist, mentor, and teach minority and women media entrepreneurs interested in entering media and communications industries.
- B. The FCC could also consider a study or report that solicits public comment on available sources of support for training, resources, upskilling, funding, mentorships, and internships for existing and aspiring diverse owners, minorities, women, LGBTQ+ populations, people with disabilities, veterans, and others with limited access.
- Information can also be solicited from the public and private sectors, as well as organizations that are regularly providing such assistance, including the National Association of Black Owned Broadcasters, National Association of Broadcasters, National Cable & Telecommunications Association, the Ad Council, community media organizations, Historically Black Colleges and Universities (HBCUs), Tribal and Hispanic Serving Institutions, and noted training programs like the NAB’s Broadcast Leadership Program (BLT)<sup>23</sup>, and the Syndeo Institute at the Cable Center that offers an excellent Intrapreneurship Program, which teaches upskilling to get to executive ranks.
  -
- C. Grant opportunities should also be included in the resource guide from government programs such as the Small Business Administration, U.S. Department of Commerce, among other agencies.

**Recommendation Four:** The FCC should work with Congress to help minorities and women gain greater access to capital through existing and emerging funding opportunities, and ad dollars (especially those allocated to federal agencies) to support diverse owners in acquisitions, operations, carriage, and marketing.

---

<sup>23</sup> According to symposium panelists Diane Sutter, under the BLT training, 59 participants who have gone through the program have become media owners. Additionally, 63% hold executive level positions across the country.

Actions:

- A. The FCC or the next charter of the CEDC should create a resource guide on available funding sources from public and private entities, including institutional investors who focus on minority companies, the Small Business Administration, and the U.S. Department of Commerce.
- B. The Commission should explore new economic and tax incentives to aid minority media companies, such as new legislation sponsored by Rep. Yvette Clark, which proposes tax incentives to cable operators to launch minority, women, or independent networks.
- C. The FCC could work with organizations like the “Once & For All” Coalition that brings leaders together from government, advertising agencies, lenders, minority business owners to create a more equitable ad ecosystem.
- D. Consistent with statutory and constitutional authority, the FCC should also consider increasing the visibility of diverse owners with a special focus on the AANHPI community.
- E. The Commission should establish a formal Working Group on the next CEDC that evaluates best practices, obstacles, and solutions that enhance supplier diversity to explore additional avenues for capital for minority- and women-owned businesses.
- F. Consistent with statutory and constitutional authority, the FCC could also use its platform to encourage media and communications industries to commit to selling to, hiring, and promoting minorities.

**Conclusion**

Diversity and Equity Workstream 4 appreciates the opportunity to share these proposals as part of the two-year CEDC charter and look forward to being a resource to FCC Chairwoman Jessica Rosenworcel and FCC colleagues upon request.